

EXHIBIT B

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ABDIQAFAR WAGAFE *et al.*, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the
United States *et al.*,

Defendants.

No. 17-cv-00094 RAJ

PLAINTIFFS' OBJECTIONS AND
ANSWERS TO DEFENDANTS' FIRST SET
OF REQUESTS FOR ADMISSION

Pursuant to Federal Rules of Civil Procedure 26 and 36, Abdiqafar Wagafe, Mehdi Ostadhassan, Hanin Omar Bengezi, Noah Adam Abraham (f/k/a Mushtaq Abed Jihad), and Sajeel Manzoor, on behalf of themselves and others similarly situated (collectively, "Plaintiffs"), hereby submit the following Objections and Answers to Defendants' First Set of Requests for Admission.

GENERAL OBJECTIONS AND RESERVATIONS

Plaintiffs' responses to the Requests for Admission are subject to and without waiver of the following objections and reservations:

1. Plaintiffs object to the Requests for Admission that impose or seek to impose any requirement or discovery obligation greater than or different from those under the Federal Rules of Civil Procedure and the applicable Local Rules and Orders of the Court.

1 2. Plaintiffs object to the Requests for Admission because Defendants' Requests for
2 Admission exceed the "limited number of Requests for Admission, not to exceed 25" the parties
3 stipulated to serve, Dkt. 205 at 3 n.2, and the parties have not stipulated to increase the number
4 of Requests for Admission that each party may serve.

5 3. Plaintiffs object to each Request for Admission to the extent that the Request for
6 Admission calls for information protected from discovery or disclosure by any privilege or
7 doctrine, including, without limitation, the attorney-client privilege or work product doctrine and
8 any privilege or doctrine that protects information from discovery or disclosure because it
9 otherwise reflects the impressions, conclusions, opinions, legal research, litigation plans or
10 theories of their attorneys. Such information or documents shall not be provided in response to
11 Defendants' Requests for Admission and any inadvertent disclosure shall not be deemed a
12 waiver of any privilege with respect to such information or of any work product immunity which
13 may attach thereto. Fed. R. Civ. P. 26(b)(5)(B).

14 4. By providing certain information requested herein, Plaintiffs do not waive any
15 privilege or protection that is or may be applicable to such information.

16 5. Plaintiffs object to the Requests for Admission to the extent they seek information
17 no longer in existence or not currently in Plaintiffs' possession, custody, or control, or to the
18 extent it refers to persons, entities, or events not known to Plaintiffs or controlled by Plaintiffs,
19 on the grounds that such definitions or Requests for Admission are overly broad, seek to require
20 more of Plaintiffs than any obligation imposed by law, would subject Plaintiffs to unreasonable
21 and undue annoyance, oppression, burden, and expense, and would seek to impose upon Plaintiff
22 an obligation to investigate, discover, or produce information or materials from third parties or
23 otherwise that are accessible to Defendants or readily obtainable from public or other sources.
24 Fed. R. Civ. P. 26(b)(1), (2).

1 6. Plaintiffs object to the Requests for Admission to the extent they seek legal
2 conclusions and/or would require Plaintiffs to reach a legal conclusion in order to prepare a
3 response.

4 7. Plaintiffs' investigation and development of facts relating to this action are
5 ongoing. These objections and answers are made without prejudice to, and are not a waiver of,
6 Plaintiffs' right to rely on other facts or documents at trial.

7 8. Plaintiffs reserve the right to supplement, clarify, revise, or correct any or all of
8 the objections and answers herein, and to assert additional objections or privileges, in one or
9 more subsequent supplemental answer(s).

10 9. The assertion of any general objections does not preclude the assertion of specific
11 objections. Nor does the assertion of additional specific objections waive applicable general
12 objections.

13 **SPECIFIC OBJECTIONS AND ANSWERS TO**
14 **REQUESTS FOR ADMISSION**

15 Without waiving or limiting in any manner any of the foregoing General Objections, but
16 rather incorporating them into the following answers to the extent applicable, Plaintiffs respond
17 to Defendants' Requests for Admission as follows:

18
19 **REQUEST FOR ADMISSION NO. 1:** Admit that Plaintiffs cannot identify any documents or
20 other evidence supporting their allegation(s) in paragraph 10 of the Second Amended Complaint
21 (hereafter "Complaint") that "CARRP prohibits USCIS field officers from approving an
22 application with an alleged potential national security concern," and "instead direct[s] officers to
23 deny the application or delay adjudication—often indefinitely."

24 **ANSWER:** Plaintiffs object to Request for Admission No. 1 because it seeks information that is
25 attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
26 documents/information produced by Defendants and documents/information obtained from other

1 sources. Without waiving the General Objections, which are incorporated herein, and the
 2 foregoing Specific Objections, Plaintiffs deny.

3
 4 **REQUEST FOR ADMISSION NO. 2:** Admit that Plaintiffs cannot identify any documents or
 5 other evidence supporting their allegation(s) in paragraph 11 of the Complaint that “CARRP
 6 identifies national security concerns based on . . . characteristics such as national origin.”

7 **ANSWER:** Plaintiffs object to Request for Admission No. 2 because it seeks information that is
 8 attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 9 documents/information produced by Defendants and documents/information obtained from other
 10 sources. Without waiving the General Objections, which are incorporated herein, and the
 11 foregoing Specific Objections, Plaintiffs deny.

12
 13 **REQUEST FOR ADMISSION NO. 3:** Admit that Plaintiffs cannot identify any documents or
 14 other evidence supporting their allegation(s) in paragraph 13 of the Complaint that “two recent
 15 immigration Executive Orders issued by Defendant Donald Trump suggest the number of
 16 residents subjected to CARRP will expand in the coming months and years.”

17 **ANSWER:** Plaintiffs object to Request for Admission No. 3 because it seeks information that is
 18 attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 19 documents/information produced by Defendants and documents/information obtained from other
 20 sources. Without waiving the General Objections, which are incorporated herein, and the
 21 foregoing Specific Objections, Plaintiffs deny.

22
 23 **REQUEST FOR ADMISSION NO. 4:** Admit that Plaintiffs cannot identify any documents or
 24 other evidence supporting their allegation(s) in paragraph 15 of the Complaint, as to USCIS
 25 suspending adjudication or of all pending petitions, applications and requests involving citizens
 26

1 or nationals of the seven countries subject to Executive Order 13769, other than from January 28,
2 2017 through February 2, 2017.

3 **ANSWER:** Plaintiffs object to Request for Admission No. 4 because it misstates paragraph 15
4 of Plaintiffs' Second Amended Complaint, and because it seeks information that is attorney work
5 product privileged in that it asks for Plaintiffs' counsel's interpretation of documents/information
6 produced by Defendants and documents/information obtained from other sources. Without
7 waiving the General Objections, which are incorporated herein, and the foregoing Specific
8 Objections, Plaintiffs admit but reserve the right to amend this answer as discovery is still
9 ongoing.

10
11 **REQUEST FOR ADMISSION NO. 5:** Admit that Plaintiffs cannot identify any documents or
12 other evidence supporting their allegation(s) in paragraph 16 of the Complaint that any "extreme
13 vetting" policy implemented under the First Executive Order would expand CARRP or has
14 expanded CARRP.

15 **ANSWER:** Plaintiffs object to Request for Admission No. 5 because it seeks information that is
16 attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
17 documents/information produced by Defendants and documents/information obtained from other
18 sources. Plaintiffs further respond that responsive documents related to the implementation of
19 Executive Order 13769 (the "First Executive Order") have been heavily redacted on several
20 grounds, including but not limited to attorney-client privilege, deliberative process privilege, law
21 enforcement privilege, and presidential communication privilege, making it difficult to ascertain
22 the implementation of the First Executive Order. Without waiving the General Objections, which
23 are incorporated herein, and the foregoing Specific Objections, Plaintiffs deny.

1 **REQUEST FOR ADMISSION NO. 6:** Admit that Plaintiffs cannot identify any documents or
 2 other evidence supporting their allegation(s) in paragraph 18 of the Complaint that “the Second
 3 EO sanctions a major expansion of the existing CARRP program.”

4 **ANSWER:** Plaintiffs object to Request for Admission No. 6 because it seeks information that is
 5 attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 6 documents/information produced by Defendants and documents/information obtained from other
 7 sources. Plaintiffs further respond that responsive documents related to implementation of
 8 Executive Order 13780 (the “Second Executive Order”) have been heavily redacted on several
 9 grounds, including but not limited to attorney-client privilege, deliberative process privilege, law
 10 enforcement privilege, and presidential communication privilege, making it difficult to ascertain
 11 the implementation of the Second Executive Order. Without waiving the General Objections,
 12 which are incorporated herein, and the foregoing Specific Objections, Plaintiffs deny.

13
 14 **REQUEST FOR ADMISSION NO. 7:** Admit that Plaintiffs cannot identify any documents or
 15 other evidence supporting their allegation(s) in paragraph 20 of the Complaint that “the
 16 applications of Plaintiff Ostadhassan, Plaintiff Bengezi, and proposed class members will be
 17 unlawfully suspended due to the application of the Second EO,” or that their applications have
 18 been “unlawfully suspended due to the application of the Second EO.”

19 **ANSWER:** Plaintiffs object to Request for Admission No. 7 because it seeks information that is
 20 attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 21 documents/information produced by Defendants and documents/information obtained from other
 22 sources. Plaintiffs further respond that responsive documents related to the implementation of
 23 Executive Order 13780 (the “Second Executive Order”) have been heavily redacted on several
 24 grounds, including but not limited to attorney-client privilege, deliberative process privilege, and
 25 law enforcement privilege, making it difficult to ascertain the implementation of the Second
 26 Executive Order. Additionally, Defendants have not produced an unredacted version Plaintiff

1 Mehdi Ostadhassan A-File nor have Defendants produced the A-Files of unnamed class
 2 members. Without waiving the General Objections, which are incorporated herein, and the
 3 foregoing Specific Objections, Plaintiffs deny the allegations as to Plaintiff Bengezi as moot
 4 because USCIS approved Bengezi's I-485 application on May 9, 2017. *See* Dkt. 60 at 10.
 5 Regarding the allegations as to Plaintiff Ostadhassan and the class members, Plaintiffs admit but
 6 the admission does not extend to the allegations regarding the application of CARRP to their
 7 applications. Plaintiffs reserve the right to amend this answer as discovery is still ongoing.

8
 9 **REQUEST FOR ADMISSION NO. 8:** Admit that Plaintiffs cannot identify any documents or
 10 other evidence supporting their allegation(s) in paragraphs 25 and 174 of the Complaint that
 11 "Plaintiff Mehdi Ostadhassan . . . satisfies all statutory criteria for adjustment of status" to lawful
 12 permanent resident," or their allegations in paragraph 173 that Plaintiff Ostadhassan "is
 13 statutorily eligible for adjustment of status."

14 **ANSWER:** Plaintiffs object to Request for Admission No. 8 because it seeks information that is
 15 attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
 16 documents/information produced by Defendants and documents/information obtained from other
 17 sources. Plaintiffs further object to this Request for Admission because Defendants have not
 18 produced an unredacted version Plaintiff Mehdi Ostadhassan A-File. Without waiving the
 19 General Objections, which are incorporated herein, and the foregoing Specific Objections,
 20 Plaintiffs deny.

21
 22 **REQUEST FOR ADMISSION NO. 9:** Admit that Plaintiffs cannot identify any documents or
 23 other evidence supporting their allegation(s) in paragraph 174 of the Complaint regarding
 24 Plaintiff Mehdi Ostadhassan that "USCIS has suspended or will suspend adjudication of his
 25 application under the First and Second EOs."
 26

1 **ANSWER:** Plaintiffs object to Request for Admission No. 9 because it seeks information that is
 2 attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
 3 documents/information produced by Defendants and documents/information obtained from other
 4 sources. Plaintiffs further object because responsive documents related to Plaintiff Mehdi
 5 Ostadhassan and the First and Second Executive Orders have been heavily redacted, making it
 6 difficult to ascertain the implementation of the First and Second Executive Orders and their
 7 effects on Ostadhassan's application. Without waiving the General Objections, which are
 8 incorporated herein, and the foregoing Specific Objections, Plaintiffs deny.

10 **REQUEST FOR ADMISSION NO. 10:** Admit that Plaintiffs cannot identify any documents or
 11 other evidence supporting their allegation(s) in paragraphs 26 and 197 of the Complaint that
 12 "under the First and Second EOs" the "USCIS has suspended or will suspend adjudication" of
 13 Plaintiff Hanin Omar Bengezi's application for adjustment to lawful permanent resident status."

14 **ANSWER:** Plaintiffs object to Request for Admission No. 10 because it seeks information that
 15 is attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
 16 documents/information produced by Defendants and documents/information obtained from other
 17 sources. Plaintiffs further respond that responsive documents related to Plaintiff Hanin Omar
 18 Bengezi and the First and Second Executive Orders have been heavily redacted, making it
 19 difficult to ascertain the implementation of the First and Second Executive Orders and their
 20 effects on Bengezi's application. Without waiving the General Objections, which are
 21 incorporated herein, and the foregoing Specific Objections, Plaintiffs deny but further respond
 22 that USCIS approved Bengezi's I-485 application on May 9, 2017. *See* Dkt. 60 at 10.

24 **REQUEST FOR ADMISSION NO. 11:** Admit that Plaintiffs cannot identify any documents or
 25 other evidence supporting their allegation(s) in paragraphs 25-28, 160, 173, 196, 217, 234, 241,
 26 and 243-44 of the Complaint that there is, or that USCIS operates, a "successor 'extreme vetting'

1 program” to CARRP, and that USCIS has subjected or will subject the applications of the named
 2 Plaintiffs and of the class plaintiffs to a “successor ‘extreme vetting’ program” to CARRP.

3 **ANSWER:** Plaintiffs object to Request for Admission No. 11 because it seeks information that
 4 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 5 documents/information produced by Defendants and documents/information obtained from other
 6 sources. Plaintiffs further object because responsive documents related to the implementation
 7 and evolution of CARRP have been heavily redacted, making it difficult to ascertain whether
 8 USCIS operates a successor extreme vetting program to CARRP. Without waiving the General
 9 Objections, which are incorporated herein, and the foregoing Specific Objections, Plaintiffs
 10 admit as to successor programs but further respond, however, that new tools and programmatic
 11 changes to CARRP have been implemented. Plaintiffs reserve the right to amend this answer as
 12 discovery is still ongoing.

13
 14 **REQUEST FOR ADMISSION NO. 12:** Admit that Plaintiffs cannot identify any documents or
 15 other evidence supporting their allegation(s) in paragraph 66 of the Complaint that the Terrorist
 16 Screening Database (TSDB) or Terrorist Watchlist includes the names of “many” persons who
 17 “present no threat to the United States.”

18 **ANSWER:** Plaintiffs object to Request for Admission No. 12 because it seeks information that
 19 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 20 documents/information produced by Defendants and documents/information obtained from other
 21 sources. Plaintiffs further object because the federal government refuses to disclose the names of
 22 those in the Terrorist Screening Database. Without waiving the General Objections, which are
 23 incorporated herein, and the foregoing Specific Objections, Plaintiffs deny.

24
 25 **REQUEST FOR ADMISSION NO. 13:** Admit that Plaintiffs cannot identify any documents or
 26 other evidence supporting their allegation(s) in paragraph 68 of the Complaint that “the Terrorist

1 Screening Center (“TSC”), which maintains the TSDB, has failed to ensure that individuals who
 2 do not meet the Watchlist’s criteria are promptly removed from the TSDB (or not blacklisted in
 3 the first place).”

4 **ANSWER:** Plaintiffs object to Request for Admission No. 13 because it seeks information that
 5 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 6 documents/information produced by Defendants and documents/information obtained from other
 7 sources. Without waiving the General Objections, which are incorporated herein, and the
 8 foregoing Specific Objections, Plaintiffs deny.

10 **REQUEST FOR ADMISSION NO. 14:** Admit that Plaintiffs cannot identify any documents or
 11 other evidence supporting their allegation(s) in paragraph 76 of the Complaint that “CARRP
 12 labels applicants national security concerns based on vague and overbroad criteria that often turn
 13 on national origin or innocuous and lawful activities or associations, . . . and . . . necessarily
 14 ensnare individuals who pose no threat to the security of the United States.”

15 **ANSWER:** Plaintiffs object to Request for Admission No. 14 because it seeks information that
 16 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 17 documents/information produced by Defendants and documents/information obtained from other
 18 sources. Without waiving the General Objections, which are incorporated herein, and the
 19 foregoing Specific Objections, Plaintiffs deny.

21 **REQUEST FOR ADMISSION NO. 15:** Admit that Plaintiffs cannot identify any documents or
 22 other evidence supporting their allegation(s) in paragraph 77 of the Complaint that “CARRP’s
 23 rules and procedures . . . guide. . . an officer[, who] cannot find a basis to deny the application, to
 24 delay adjudication as long as possible.”

25 **ANSWER:** Plaintiffs object to Request for Admission No. 15 because it seeks information that
 26 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of

1 documents/information produced by Defendants and documents/information obtained from other
2 sources. Without waiving the General Objections, which are incorporated herein, and the
3 foregoing Specific Objections, Plaintiffs deny.

4
5 **REQUEST FOR ADMISSION NO. 16:** Admit that Plaintiffs cannot identify any documents or
6 other evidence supporting their allegation(s) in paragraph 78 of the Complaint that a CARRP
7 “procedure ... called ‘deconfliction’ ... requires USCIS to ... subordinate its authority – to the
8 law enforcement agency, often the FBI, that possesses information giving rise to the ... national
9 security concern” for an application handled under CARRP.

10 **ANSWER:** Plaintiffs object to Request for Admission No. 16 because it seeks information that
11 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
12 documents/information produced by Defendants and documents/information obtained from other
13 sources. Without waiving the General Objections, which are incorporated herein, and the
14 foregoing Specific Objections, Plaintiffs deny.

15
16 **REQUEST FOR ADMISSION NO. 17:** Admit that Plaintiffs cannot identify any documents or
17 other evidence supporting their allegation(s) in paragraph 79 of the Complaint that “[d]uring
18 deconfliction” under CARRP, “the relevant law enforcement agency has authority: to instruct
19 USCIS to ask certain questions in an interview or to issue a Request for Evidence (“RFE”); ...
20 and to request that USCIS deny, grant or hold the application in abeyance for an indefinite period
21 of time.”

22 **ANSWER:** Plaintiffs object to Request for Admission No. 17 because it seeks information that
23 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
24 documents/information produced by Defendants and documents/information obtained from other
25 sources. Without waiving the General Objections, which are incorporated herein, and the
26 foregoing Specific Objections, Plaintiffs deny.

1
2 **REQUEST FOR ADMISSION NO. 18:** Admit that Plaintiffs cannot identify any documents or
3 other evidence supporting their allegation(s) in paragraph 81 of the Complaint that “USCIS often
4 makes decisions to deny immigration benefit applications because the FBI requests or
5 recommends the denial, not because the person is statutorily ineligible for the benefit.”

6 **ANSWER:** Plaintiffs object to Request for Admission No. 18 because it seeks information that
7 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
8 documents/information produced by Defendants and documents/information obtained from other
9 sources. Without waiving the General Objections, which are incorporated herein, and the
10 foregoing Specific Objections, Plaintiffs deny.

11
12 **REQUEST FOR ADMISSION NO. 19:** Admit that Plaintiffs cannot identify any documents or
13 other evidence supporting their allegation(s) in paragraph 82 of the Complaint that “[t]he FBI
14 often seeks to use the pending immigration application to coerce the applicant to act as an
15 informant or otherwise provide information.”

16 **ANSWER:** Plaintiffs object to Request for Admission No. 19 because it seeks information that
17 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
18 documents/information produced by Defendants and documents/information obtained from other
19 sources. Without waiving the General Objections, which are incorporated herein, and the
20 foregoing Specific Objections, Plaintiffs deny.

21
22 **REQUEST FOR ADMISSION NO. 20:** Admit that Plaintiffs cannot identify any documents or
23 other evidence supporting their allegation(s) in paragraph 84 of the Complaint that “[w]here no
24 legitimate reason supports denial of an application subjected to CARRP, USCIS officers often
25 utilize spurious or pretextual reasons to deny the application.”
26

1 **ANSWER:** Plaintiffs object to Request for Admission No. 20 because it seeks information that
2 is attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
3 documents/information produced by Defendants and documents/information obtained from other
4 sources. Without waiving the General Objections, which are incorporated herein, and the
5 foregoing Specific Objections, Plaintiffs deny.

6
7 **REQUEST FOR ADMISSION NO. 21:** Admit that Plaintiffs cannot identify any documents or
8 other evidence supporting their allegation(s) in paragraph 94 of the Complaint that "USCIS
9 routinely delays adjudication of applications subject to CARRP when it cannot find a reason to
10 deny the application."

11 **ANSWER:** Plaintiffs object to Request for Admission No. 21 because it seeks information that
12 is attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
13 documents/information produced by Defendants and documents/information obtained from other
14 sources. Without waiving the General Objections, which are incorporated herein, and the
15 foregoing Specific Objections, Plaintiffs deny.

16
17 **REQUEST FOR ADMISSION NO. 22:** Admit that Plaintiffs cannot identify any documents or
18 other evidence supporting their allegation(s) in paragraph 94 of the Complaint that "[w]hen an
19 applicant files a mandamus action to compel USCIS to finally adjudicate his or her pending
20 application, it often has the effect of forcing USCIS to deny a statutorily-eligible application on
21 pretextual grounds."

22 **ANSWER:** Plaintiffs object to Request for Admission No. 22 because it seeks information that
23 is attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
24 documents/information produced by Defendants and documents/information obtained from other
25 sources. Without waiving the General Objections, which are incorporated herein, and the
26 foregoing Specific Objections, Plaintiffs deny.

1
2 **REQUEST FOR ADMISSION NO. 23:** Admit that Plaintiffs cannot identify any documents or
3 other evidence supporting their allegation(s) in paragraph 97 of the Complaint that “CARRP
4 results in ... pre-textual denials of statutorily-eligible immigration applications.”

5 **ANSWER:** Plaintiffs object to Request for Admission No. 23 because it seeks information that
6 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
7 documents/information produced by Defendants and documents/information obtained from other
8 sources. Without waiving the General Objections, which are incorporated herein, and the
9 foregoing Specific Objections, Plaintiffs deny.

10
11 **REQUEST FOR ADMISSION NO. 24:** Admit that Plaintiffs cannot identify any documents or
12 other evidence supporting their allegation(s) in paragraph 141 of the Complaint that “the Second
13 EO” has “required” an ““extreme vetting”” program” that “will dramatically expand CARRP,” or
14 that the Second EO has “dramatically expand[ed] CARRP.”

15 **ANSWER:** Plaintiffs object to Request for Admission No. 24 because it seeks information that
16 is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
17 documents/information produced by Defendants and documents/information obtained from other
18 sources. Plaintiffs further respond that responsive documents related to implementation of
19 Executive Order 13780 (the “Second Executive Order”) have been redacted on several grounds,
20 including but not limited to attorney-client privilege, deliberative process privilege, law
21 enforcement privilege, and presidential communication, making it difficult to ascertain the
22 implementation of the Second Executive Order. Without waiving the General Objections, which
23 are incorporated herein, and the foregoing Specific Objections, Plaintiffs deny.

1 **REQUEST FOR ADMISSION NO. 25:** Admit that Plaintiffs cannot identify any documents or
2 other evidence supporting their allegation(s) in paragraph 161 that subjecting Plaintiff Abdiqafar
3 Wagafe's "application to CARRP ... harmed his professional options ..."

4 **ANSWER:** Plaintiffs object to Request for Admission No. 25 because it seeks information that
5 is attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
6 documents/information produced by Defendants and documents/information obtained from other
7 sources. Without waiving the General Objections, which are incorporated herein, and the
8 foregoing Specific Objections, Plaintiffs deny.

9
10 **REQUEST FOR ADMISSION NO. 26:** Admit that Plaintiffs cannot identify any documents or
11 other evidence supporting their allegation(s) in paragraph 218 of the Complaint that "under the
12 First EO," the "USCIS suspended adjudication" of Plaintiff Mushtaq Abed Jihad's application
13 for adjustment of status."

14 **ANSWER:** Plaintiffs object to Request for Admission No. 26 because the parties stipulated to
15 serving "a limited number of Requests for Admission, not to exceed 25," Dkt. 205 at 3 n.2, and
16 the parties have not stipulated to increase the number of Requests for Admission that each party
17 may serve. Plaintiffs further object to this Request for Admission because it seeks information
18 that is attorney work product privileged in that it asks for Plaintiffs' counsel's interpretation of
19 documents/information produced by Defendants and documents/information obtained from other
20 sources.

21
22 **REQUEST FOR ADMISSION NO. 27:** Admit that Plaintiffs cannot identify any documents or
23 other evidence supporting their allegation(s) in paragraph 251 of the Complaint that "Defendants
24 have interpreted the First EO ... to authorize the suspension of immigration petitions,
25 applications, or requests involving Plaintiff Wagafe, Plaintiff Ostadhassan, [and] Plaintiff
26 Bengezi ..."

1 **ANSWER:** Plaintiffs object to Request for Admission No. 27 because the parties stipulated to
 2 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
 3 the parties have not stipulated to increase the number of Requests for Admission that each party
 4 may serve. Plaintiffs further object to this Request for Admission because it seeks information
 5 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 6 documents/information produced by Defendants and documents/information obtained from other
 7 sources.

8
 9 **REQUEST FOR ADMISSION NO. 28:** Admit that Plaintiffs cannot identify any documents or
 10 other evidence supporting their allegation(s) in paragraph 251-52 of the Complaint that
 11 “Defendants ...will interpret the Second EO to authorize the suspension of immigration
 12 petitions, applications, or requests involving Plaintiff Wagafe, Plaintiff Ostadhassan, [and]
 13 Plaintiff Bengezi,” and that Defendants will suspend adjudication of such immigration benefits
 14 petitions, applications, or requests” by Plaintiffs Wagafe, Ostadhassan and Bengezi.

15 **ANSWER:** Plaintiffs object to Request for Admission No. 28 because the parties stipulated to
 16 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
 17 the parties have not stipulated to increase the number of Requests for Admission that each party
 18 may serve. Plaintiffs further object to this Request for Admission because it seeks information
 19 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 20 documents/information produced by Defendants and documents/information obtained from other
 21 sources.

22
 23 **REQUEST FOR ADMISSION NO. 29:** Admit that Plaintiffs cannot identify any documents or
 24 other evidence supporting their allegation(s) in paragraph 268 of the Complaint that the
 25 Defendants “indefinite[ly] suspend[ed] ... adjudication of [the class] Plaintiffs’ applications for
 26 immigration benefits on the basis of their country of origin, and without sufficient justification.”

1 **ANSWER:** Plaintiffs object to Request for Admission No. 29 because the parties stipulated to
2 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
3 the parties have not stipulated to increase the number of Requests for Admission that each party
4 may serve. Plaintiffs further object to this Request for Admission because it seeks information
5 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
6 documents/information produced by Defendants and documents/information obtained from other
7 sources.

8
9 **REQUEST FOR ADMISSION NO. 30:** Admit that Plaintiffs cannot identify any documents or
10 other evidence supporting their allegation(s) in paragraph 269 of the Complaint that Defendants
11 “indefinite[ly] suspended ... adjudication of Plaintiff Wagafe’s, Plaintiff Ostadhassan’s, [and]
12 Plaintiff Bengezi’s ... applications for immigration benefits under the First and Second EOs.”

13 **ANSWER:** Plaintiffs object to Request for Admission No. 30 because the parties stipulated to
14 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
15 the parties have not stipulated to increase the number of Requests for Admission that each party
16 may serve. Plaintiffs further object to this Request for Admission because it seeks information
17 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
18 documents/information produced by Defendants and documents/information obtained from other
19 sources.

20
21 **REQUEST FOR ADMISSION NO. 31:** Admit that Plaintiffs have not received any responses
22 to their Public Notice.

23 **ANSWER:** Plaintiffs object to Request for Admission No. 31 because the parties stipulated to
24 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
25 the parties have not stipulated to increase the number of Requests for Admission that each party
26

1 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
2 information protected by attorney-client privilege or work product doctrine.
3

4 **REQUEST FOR ADMISSION NO. 32:** Admit that Plaintiffs have not received more than 5
5 responses to their Public Notice.

6 **ANSWER:** Plaintiffs object to Request for Admission No. 32 because the parties stipulated to
7 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
8 the parties have not stipulated to increase the number of Requests for Admission that each party
9 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
10 information protected by attorney-client privilege or work product doctrine.
11

12 **REQUEST FOR ADMISSION NO. 33:** Admit that Plaintiffs have not received more than 10
13 responses to their Public Notice.

14 **ANSWER:** Plaintiffs object to Request for Admission No. 33 because the parties stipulated to
15 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
16 the parties have not stipulated to increase the number of Requests for Admission that each party
17 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
18 information protected by attorney-client privilege or work product doctrine.
19

20 **REQUEST FOR ADMISSION NO. 34:** Admit that Plaintiffs have not received more than 25
21 responses to their Public Notice.

22 **ANSWER:** Plaintiffs object to Request for Admission No. 34 because the parties stipulated to
23 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
24 the parties have not stipulated to increase the number of Requests for Admission that each party
25 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
26 information protected by attorney-client privilege or work product doctrine.

1
2 **REQUEST FOR ADMISSION NO. 35:** Admit that Plaintiffs have not received more than 50
3 responses to their Public Notice.

4 **ANSWER:** Plaintiffs object to Request for Admission No. 35 because the parties stipulated to
5 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
6 the parties have not stipulated to increase the number of Requests for Admission that each party
7 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
8 information protected by attorney-client privilege or work product doctrine.

9
10 **REQUEST FOR ADMISSION NO. 36:** Admit that Plaintiffs have not received more than 100
11 responses to their Public Notice.

12 **ANSWER:** Plaintiffs object to Request for Admission No. 36 because the parties stipulated to
13 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
14 the parties have not stipulated to increase the number of Requests for Admission that each party
15 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
16 information protected by attorney-client privilege or work product doctrine.

17
18 **REQUEST FOR ADMISSION NO. 37:** Admit that Plaintiffs have not received more than 5
19 responses to their Public Notice from members of the Naturalization Class.

20 **ANSWER:** Plaintiffs object to Request for Admission No. 37 because the parties stipulated to
21 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
22 the parties have not stipulated to increase the number of Requests for Admission that each party
23 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
24 information protected by attorney-client privilege or work product doctrine.

1 **REQUEST FOR ADMISSION NO. 38:** Admit that Plaintiffs have not received more than 10
2 responses to their Public Notice from members of the Naturalization Class.

3 **ANSWER:** Plaintiffs object to Request for Admission No. 38 because the parties stipulated to
4 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
5 the parties have not stipulated to increase the number of Requests for Admission that each party
6 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
7 information protected by attorney-client privilege or work product doctrine.

8
9 **REQUEST FOR ADMISSION NO. 39:** Admit that Plaintiffs have not received more than 25
10 responses to their public notice from members of the Naturalization Class.

11 **ANSWER:** Plaintiffs object to Request for Admission No. 39 because the parties stipulated to
12 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
13 the parties have not stipulated to increase the number of Requests for Admission that each party
14 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
15 information protected by attorney-client privilege or work product doctrine.

16
17 **REQUEST FOR ADMISSION NO. 40:** Admit that Plaintiffs have not received more than 50
18 responses to their Public Notice from members of the Naturalization Class.

19 **ANSWER:** Plaintiffs object to Request for Admission No. 40 because the parties stipulated to
20 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
21 the parties have not stipulated to increase the number of Requests for Admission that each party
22 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
23 information protected by attorney-client privilege or work product doctrine.

24
25 **REQUEST FOR ADMISSION NO. 41:** Admit that Plaintiffs have not received more than 100
26 responses to their Public Notice from members of the Naturalization Class.

1 **ANSWER:** Plaintiffs object to Request for Admission No. 41 because the parties stipulated to
2 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
3 the parties have not stipulated to increase the number of Requests for Admission that each party
4 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
5 information protected by attorney-client privilege or work product doctrine.

6
7 **REQUEST FOR ADMISSION NO. 42:** Admit that Plaintiffs have not received any responses
8 to their Public Notice from members of the Adjustment Class.

9 **ANSWER:** Plaintiffs object to Request for Admission No. 42 because the parties stipulated to
10 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
11 the parties have not stipulated to increase the number of Requests for Admission that each party
12 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
13 information protected by attorney-client privilege or work product doctrine.

14
15 **REQUEST FOR ADMISSION NO. 43:** Admit that Plaintiffs have not received more than 5
16 responses to their Public Notice from members of the Adjustment Class.

17 **ANSWER:** Plaintiffs object to Request for Admission No. 43 because the parties stipulated to
18 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
19 the parties have not stipulated to increase the number of Requests for Admission that each party
20 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
21 information protected by attorney-client privilege or work product doctrine.

22
23 **REQUEST FOR ADMISSION NO. 44:** Admit that Plaintiffs have not received more than 10
24 responses to their Public Notice from members of the Adjustment Class.

25 **ANSWER:** Plaintiffs object to Request for Admission No. 44 because the parties stipulated to
26 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and

1 the parties have not stipulated to increase the number of Requests for Admission that each party
2 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
3 information protected by attorney-client privilege or work product doctrine.
4

5 **REQUEST FOR ADMISSION NO. 45:** Admit that Plaintiffs have not received more than 25
6 responses to their Public Notice from members of the Adjustment Class.

7 **ANSWER:** Plaintiffs object to Request for Admission No. 45 because the parties stipulated to
8 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
9 the parties have not stipulated to increase the number of Requests for Admission that each party
10 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
11 information protected by attorney-client privilege or work product doctrine.
12

13 **REQUEST FOR ADMISSION NO. 46:** Admit that Plaintiffs have not received more than 50
14 responses to their Public Notice from members of the Adjustment Class.

15 **ANSWER:** Plaintiffs object to Request for Admission No. 46 because the parties stipulated to
16 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
17 the parties have not stipulated to increase the number of Requests for Admission that each party
18 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
19 information protected by attorney-client privilege or work product doctrine.
20

21 **REQUEST FOR ADMISSION NO. 47:** Admit that Plaintiffs have not received more than 75
22 responses to their Public Notice from members of the Adjustment Class.

23 **ANSWER:** Plaintiffs object to Request for Admission No. 47 because the parties stipulated to
24 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
25 the parties have not stipulated to increase the number of Requests for Admission that each party
26

1 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
2 information protected by attorney-client privilege or work product doctrine.

3
4 **REQUEST FOR ADMISSION NO. 48:** Admit that Plaintiffs have not received any responses
5 to their Public Notice from class members from a Muslim Majority Country.

6 **ANSWER:** Plaintiffs object to Request for Admission No. 48 because the parties stipulated to
7 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
8 the parties have not stipulated to increase the number of Requests for Admission that each party
9 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
10 information protected by attorney-client privilege or work product doctrine.

11
12 **REQUEST FOR ADMISSION NO. 49:** Admit that Plaintiffs have not received more than 5
13 responses to their Public Notice from class members from any Muslim Majority Country.

14 **ANSWER:** Plaintiffs object to Request for Admission No. 49 because the parties stipulated to
15 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
16 the parties have not stipulated to increase the number of Requests for Admission that each party
17 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
18 information protected by attorney-client privilege or work product doctrine.

19
20 **REQUEST FOR ADMISSION NO. 50:** Admit that Plaintiffs have not received more than 10
21 responses to their Public Notice from class members from any Muslim Majority Country.

22 **ANSWER:** Plaintiffs object to Request for Admission No. 50 because the parties stipulated to
23 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
24 the parties have not stipulated to increase the number of Requests for Admission that each party
25 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
26 information protected by attorney-client privilege or work product doctrine.

1
2 **REQUEST FOR ADMISSION NO. 51:** Admit that Plaintiffs have not received more than 25
3 responses to their Public Notice from class members from any Muslim Majority Country.

4 **ANSWER:** Plaintiffs object to Request for Admission No. 51 because the parties stipulated to
5 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
6 the parties have not stipulated to increase the number of Requests for Admission that each party
7 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
8 information protected by attorney-client privilege or work product doctrine.
9

10 **REQUEST FOR ADMISSION NO. 52:** Admit that Plaintiffs have not received more than 50
11 responses to their Public Notice from class members from any Muslim Majority Country.

12 **ANSWER:** Plaintiffs object to Request for Admission No. 52 because the parties stipulated to
13 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
14 the parties have not stipulated to increase the number of Requests for Admission that each party
15 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
16 information protected by attorney-client privilege or work product doctrine.
17

18 **REQUEST FOR ADMISSION NO. 53:** Admit that Plaintiffs have not received more than 100
19 responses to their Public Notice from class members from any Muslim Majority Country.

20 **ANSWER:** Plaintiffs object to Request for Admission No. 53 because the parties stipulated to
21 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
22 the parties have not stipulated to increase the number of Requests for Admission that each party
23 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
24 information protected by attorney-client privilege or work product doctrine.
25
26

1 **REQUEST FOR ADMISSION NO. 54:** Admit that Plaintiffs have not received any responses
2 to their Public Notice from class members with an application pending with USCIS for more
3 than 2 years.

4 **ANSWER:** Plaintiffs object to Request for Admission No. 54 because the parties stipulated to
5 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
6 the parties have not stipulated to increase the number of Requests for Admission that each party
7 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
8 information protected by attorney-client privilege or work product doctrine.

9
10 **REQUEST FOR ADMISSION NO. 55:** Admit that Plaintiffs have not received more than 5
11 responses to their Public Notice from class members with an application pending with USCIS for
12 more than 2 years.

13 **ANSWER:** Plaintiffs object to Request for Admission No. 55 because the parties stipulated to
14 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
15 the parties have not stipulated to increase the number of Requests for Admission that each party
16 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
17 information protected by attorney-client privilege or work product doctrine.

18
19 **REQUEST FOR ADMISSION NO. 56:** Admit that Plaintiffs have not received more than 10
20 responses to their Public Notice from class members with an application pending with USCIS for
21 more than 2 years.

22 **ANSWER:** Plaintiffs object to Request for Admission No. 56 because the parties stipulated to
23 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
24 the parties have not stipulated to increase the number of Requests for Admission that each party
25 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
26 information protected by attorney-client privilege or work product doctrine.

1
2 **REQUEST FOR ADMISSION NO. 57:** Admit that Plaintiffs have not received more than 25
3 responses to their Public Notice from class members with an application pending with USCIS for
4 more than 2 years.

5 **ANSWER:** Plaintiffs object to Request for Admission No. 57 because the parties stipulated to
6 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
7 the parties have not stipulated to increase the number of Requests for Admission that each party
8 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
9 information protected by attorney-client privilege or work product doctrine.
10

11 **REQUEST FOR ADMISSION NO. 58:** Admit that Plaintiffs have not received more than 50
12 responses to their Public Notice from class members with an application pending with USCIS for
13 more than 2 years.

14 **ANSWER:** Plaintiffs object to Request for Admission No. 58 because the parties stipulated to
15 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
16 the parties have not stipulated to increase the number of Requests for Admission that each party
17 may serve. Plaintiffs further object to this Request for Admission to the extent it seeks
18 information protected by attorney-client privilege or work product doctrine.
19

20 **REQUEST FOR ADMISSION NO. 59:** Admit that the documents contained within the
21 Certified Administrative Record are certified as correct by a person authorized to make such
22 certification.

23 **ANSWER:** Plaintiffs object to Request for Admission No. 59 because the parties stipulated to
24 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
25 the parties have not stipulated to increase the number of Requests for Admission that each party
26 may serve.

1
2 **REQUEST FOR ADMISSION NO. 60:** Admit that the documents contained within the
3 Certified Administrative Record are self-authenticated as set forth in Rule 902 of the Federal
4 Rules of Evidence.

5 **ANSWER:** Plaintiffs object to Request for Admission No. 60 because the parties stipulated to
6 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
7 the parties have not stipulated to increase the number of Requests for Admission that each party
8 may serve.

9
10 **REQUEST FOR ADMISSION NO. 61:** Admit that the documents contained within the
11 Certified Administrative Record are reports or records of, or statements of, a public office or
12 agency.

13 **ANSWER:** Plaintiffs object to Request for Admission No. 61 because the parties stipulated to
14 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
15 the parties have not stipulated to increase the number of Requests for Admission that each party
16 may serve.

17
18 **REQUEST FOR ADMISSION NO. 62:** Admit that the documents contained within the
19 Certified Administrative Record are records of a regularly conducted activity, as provided in
20 Fed. R. Evid. 803(6).

21 **ANSWER:** Plaintiffs object to Request for Admission No. 62 because the parties stipulated to
22 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
23 the parties have not stipulated to increase the number of Requests for Admission that each party
24 may serve.

1 **REQUEST FOR ADMISSION NO. 63:** Admit that Plaintiffs have no evidence to refute that
2 most (over 50%) of the applications for either naturalization (N-400) or adjustment of status (I-
3 485) submitted between Fiscal Year (FY) 2013 and March of FY 2019 were not processed under
4 CARRP.

5 **ANSWER:** Plaintiffs object to Request for Admission No. 63 because the parties stipulated to
6 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
7 the parties have not stipulated to increase the number of Requests for Admission that each party
8 may serve. Plaintiffs further object to this Request for Admission because it seeks information
9 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
10 documents/information produced by Defendants and documents/information obtained from other
11 sources.

12
13 **REQUEST FOR ADMISSION NO. 64:** Admit that Plaintiffs have no evidence to refute that
14 most (over 50%) of the applications for naturalization (N-400) and adjustment of status (I-485)
15 submitted by applicants from Muslim Majority Countries, between FY 2013 and March of FY
16 2019, were not processed under CARRP.

17 **ANSWER:** Plaintiffs object to Request for Admission No. 64 because the parties stipulated to
18 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
19 the parties have not stipulated to increase the number of Requests for Admission that each party
20 may serve. Plaintiffs further object to this Request for Admission because it seeks information
21 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
22 documents/information produced by Defendants and documents/information obtained from other
23 sources.

1 **REQUEST FOR ADMISSION NO. 65:** Admit that Plaintiffs have no evidence to refute that
 2 most (over 50%) of the applications for naturalization (N-400) and most for adjustment of status
 3 (I-485), which were processed under CARRP and adjudicated between FY 2013 and March of
 4 FY 2019, were granted.

5 **ANSWER:** Plaintiffs object to Request for Admission No. 65 because the parties stipulated to
 6 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
 7 the parties have not stipulated to increase the number of Requests for Admission that each party
 8 may serve. Plaintiffs further object to this Request for Admission because it seeks information
 9 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 10 documents/information produced by Defendants and documents/information obtained from other
 11 sources.

12
 13 **REQUEST FOR ADMISSION NO. 66:** Admit that Plaintiffs cannot identify any evidence that
 14 USCIS suspended its adjudication of any naturalization or adjustment of status applications from
 15 applicants from any country pursuant to either Executive Order 13780 or Presidential
 16 Proclamation 9645, *Enhancing Vetting Capabilities and Processes for Detecting Attempted*
 17 *Entry into the United States by Terrorists or Other Public-Safety Threats*, 82 FR 45161 (Sept.
 18 27, 2017).

19 **ANSWER:** Plaintiffs object to Request for Admission No. 66 because the parties stipulated to
 20 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
 21 the parties have not stipulated to increase the number of Requests for Admission that each party
 22 may serve. Plaintiffs further object to this Request for Admission because it seeks information
 23 that is attorney work product privileged in that it asks for Plaintiffs’ counsel’s interpretation of
 24 documents/information produced by Defendants and documents/information obtained from other
 25 sources.

1 **REQUEST FOR ADMISSION NO. 67:** Admit that CARRP permits USCIS officers to grant
2 an immigration benefit application with a potential national security concern for or involving a
3 non-KST (*i.e.*, someone who is not a Known or Suspected Terrorist) if the officers obtain
4 supervisory approval before granting the application.

5 **ANSWER:** Plaintiffs object to Request for Admission No. 67 because the parties stipulated to
6 serving “a limited number of Requests for Admission, not to exceed 25,” Dkt. 205 at 3 n.2, and
7 the parties have not stipulated to increase the number of Requests for Admission that each party
8 may serve.

1 DATED: October 11, 2019

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CERTIFICATE OF SERVICE

The undersigned certifies that on October 11, 2019, I caused service of the foregoing document via email to all counsel of record herein.

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16 I certify under penalty of perjury that the foregoing is true and correct.

17 DATED this 11th day of October, 2019, at Seattle, Washington.

18
19 s/ Cristina Sepe
Cristina Sepe, WSBA No. 53609